

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

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|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | CRIMINAL NO. 09-10243-MLW |
| |) | |
| RYAN HARRIS |) | |

DEFENDANT'S MOTION FOR LEAVE TO LATE FILE
SUBMISSIONS REQUIRED BY ORDER OF THIS COURT

Undersigned counsel moves to late file his submissions as ordered in the Order of December 14, 2011.

As grounds for this motion, counsel states that he failed to file his submissions as required by the Order, and he apologizes for the failure. He asks that the Court consider his efforts in the pretrial stage of this case, raising in multiple filings important contests to the pleadings, as the measure of his diligence. In addition, he was out of the United States from January 4-20, preparing a second case for trial while simultaneously working nights on the present case. This, however, is no excuse as he is embarrassed and contrite about his failure to file timely here. He intended no disrespect to the Court, and has long represented clients in this session, always attempting to meet the high standards expected of counsel in this Court.

For these reasons, he asks to be permitted to late file his

response.

RYAN HARRIS
By his attorney,

/s/ Charles P. McGinty

Charles P. McGinty
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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 31, 2012.

/s/ Charles P. McGinty

Charles P. McGinty